

## REMARKS

Upon entry of this amendment, claims 3-4, 8-13, 15-16, 19, and 21-49 will be pending.

Applicant thanks the Examiner for meeting with his representative on September, 26, 2001.

As a result of the Examiner interview, Applicant has amended claims 8, 13, 21-22, 26-27, 31-32, 33, and 35, and added new claims 37-49. Claim 8 has been amended to clarify that at least two speech-enabled applications are being controlled by the developed speech menu and that at least one candidate sound from each application is compared to a previously-stored sound command. In addition, the distance accuracy module is capable of installing the sound commands for each application. Claim 13 has been amended to clarify that sound commands from at least two device predetermined tables are compared to previously-stored sound commands, and that sound commands for each device can be installed in the speech menu. Claim 21 has been amended to clarify that the speech menu controls at least two devices, and that the method identifies at least two devices having candidate audio commands. In addition, claim 21 now clarifies that each of the candidate audio commands for each device is compared with previously registered audio commands. Similarly, claim 26 has been amended to clarify that the speech menu controls at least two devices and that the method compares at least one candidate audio command from each device with a previously installed audio command. Claim 35 has been amended to clarify that the candidate audio commands of at least two devices are compared to previously registered audio commands. Support for these amendments can be found in Figures 1, 2, 3, and 5 and on pages 4-5 of the originally filed specification.

Claims 22, 27, and 33 have also been amended to correct formal matters. Claim 32 has been amended to correct a formal matter concerning antecedent basis by changing "signaling" to "installing". No change in scope is intended by these amendment.

Applicant has added new claims 37-49. These claims claim various embodiments of the present invention, including a method for building a speech menu from separate pre-existing speech menus, a speech-enabled apparatus, a set of instructions, and a computer data signal. Each of the claimed embodiments include the concepts of pre-trained audio commands and pre-existing speech menus. Support for new claims 37-49 can be found on pages 4-7 of the originally filed application.

Applicant respectfully submits that the now pending claims, 3-4, 8-13, 15-16, 19, and 21-49 do not include any new matter and meet all of the requirements of 35 U.S.C. §112.

Turning to the previously cited prior art references, Lasar and Meunier et al., Applicant respectfully submits that neither reference discloses or suggests the subject matter of the pending claims. Applicant's invention provides a method for combining two or more speech menus into a final speech menu, which can control two or more devices or programs.

For example, Applicant's independent claim 8 recites a speech-enabled apparatus for developing a speech menu to control at least two speech-enabled applications. The claimed apparatus comprises a distance accuracy module capable of comparing candidate sound commands for each application to a previously-stored sound command and installing the sound commands for each application based on a predetermined value. Similarly, independent claim 43 also claims a speech-enabled apparatus, which is capable of determining the similarity of pre-trained audio commands selected from pre-existing speech menus to then form a final speech menu. Applicant respectfully submits that Meunier et al. does not disclose or suggest a speech-enabled apparatus for controlling at least two speech-enabled applications or an apparatus capable of forming a final speech menu from pre-trained audio commands selected from pre-existing speech menus. Instead, Meunier et al. discloses training a model word and then comparing the trained model to a set of existing vocabulary words.

Furthermore, Applicant's independent claim 13 recites a set of instructions, which are capable of being executed to develop a speech menu. The set of instructions compares sound commands from at least two device predetermined tables and install the sound commands into a speech menu. Similarly, independent claim 47 also recites a set of instructions, which determine a similarity of at least to pre-trained audio commands from pre-existing speech menus and combines the audio commands into a final speech menu. Applicant submits that Meunier et al. does not disclose or suggest a set of instructions that compares sound/audio commands from at least two devices nor that the audio commands are pre-trained and selected from pre-existing speech menus.

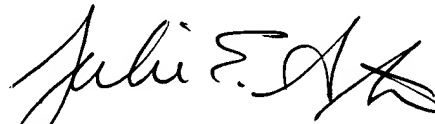
In addition, Applicant's independent claims 21 and 26 recite a method of building a speech menu to control at least two devices. In addition, independent claim 37 recites a method for building a speech menu from separate pre-existing speech menus. Applicant again submits that Meunier et al. does not teach or suggest such methods.

Finally, Applicant's independent claims 35 and 49 recite computer data signals comprising a comparison source code segment for audio commands of at least two devices (37) and a determining source code segment comparing at least two pre-trained audio commands from pre-existing speech menus. Applicant respectfully submits that Meunier et al. does not disclose comparing audio commands from at least two devices nor comparing audio commands that are pre-trained from pre-existing speech menus.

Furthermore, Lasar does not disclose the claimed elements discussed above either, nor does the combination of Meunier et al. and Lasar render Applicant's claims obvious. Lasar discloses a device that takes musical tones and converts them to digital signals/numbers that can be used to control a given device. There is no teaching or suggestion of combining two or more speech menus or controlling more than one device using a combined speech menu. Nor is there any teaching or suggestion of pre-trained audio commands selected from pre-existing speech menus. Therefore, Applicant respectfully submits that one of ordinary skill in the art would not have been motivated to achieve Applicant's claimed invention by combining Meunier et al. and Lasar.

In view of the above amendments and remarks, Applicant respectfully requests allowance of the application.

Respectfully submitted,



Julie E. Stein  
Registration No. 43,158

Date: 10-4-01

KENYON & KENYON  
1500 K Street, NW, Suite 700  
Washington, D.C. 20005

Phone: (202) 220-4200  
Fax.: (202) 220-4201  
[jstein@kenyon.com](mailto:jstein@kenyon.com)

### Versions with Markings to Show Changes Made

8. (Twice Amended) A speech-enabled apparatus for developing a speech menu [for a] to control at least two speech-enabled applications, comprising: a distance accuracy module capable of comparing [a] at least one candidate sound command from each application [a predetermined table] to a previously-stored sound command in the speech menu to determine an accuracy value, the distance accuracy module capable of installing the [first] sound commands for each application unless the accuracy value is less than a predetermined value.
13. (Twice Amended) A set of instructions residing in a storage medium, the set of instructions capable of being executed by a processor to implement a development of a speech menu for a speech-enabled application, the method comprising the steps of:
- a) comparing [a] candidate sound commands from [a] at least two device predetermined tables' to previously-stored sound commands to determine an accuracy value therebetween; and
  - b) if the accuracy values each are less than a predetermined value, installing the candidate sound commands of each device in the speech menu.
21. (Amended) A method of building a speech menu to control at least two devices, comprising:
- [for a table including an execution command associated with a plurality of candidate audio commands,] identifying at least two devices, each device having at least one candidate audio command associated with it,
- comparing each of the candidate audio commands of each device with previously registered audio commands to develop an accuracy value, and adding to the speech menu those candidate audio commands for which associated accuracy values exceed a predetermined value.
22. (Amended) The method of claim 21, further comprising installing [the] a new execution command in association with any stored candidate audio commands.

26. (Amended) A method of building a speech menu to control at least two devices, comprising:  
[from a predetermined table associating a candidate audio command with an execution command,] comparing [the] at least one candidate audio command from each device with each audio command previously installed in the speech menu to develop an accuracy value, and  
installing the candidate audio commands in the speech menu if each of the accuracy values exceeds a predetermined value.
27. (Amended) The method of claim 26, further comprising installing [the] an execution command in association with the candidate audio command.
31. (Amended) The method of claim 26, wherein the comparing and [signaling] installing occur automatically, without user intervention
32. (Amended) The speech-enabled apparatus of claim 8, wherein any one of the candidate audio commands is one of a plurality of candidate audio commands defined in [the] a table associated with an execution command.
33. (Amended) The speech-enabled apparatus of claim 8 further capable of installing an execution command in association with [the] a candidate audio command.
35. (Amended) A computer data signal embodied in a carrier wave to develop a speech menu for a speech-enabled application, the computer data signal comprising:  
a) a comparison source code segment comparing, [for a table associating a new execution command with a plurality of candidate audio commands, each of

the] candidate audio commands of at least two devices with previously registered audio commands to develop [an] accuracy values, and

b) an installation source code segment installing [a] the candidate audio commands in the speech menu if each of the accuracy values associated with the respective candidate audio command exceeds a predetermined value.